



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

June 23, 1999

MEMORANDUM:

Subject: Efficacy Review for 9150-2/Anthium Dioxide
DP Barcode: D252601

From: Srinivas Gowda, MSc., M.A., Microbiologist *Srinivas Gowda*
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Applicant: International Dioxide, Inc.
North Kingston, RI

*Revised review.
Evidence included.*

*See 40 CFR 152.
520*

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Chlorine Dioxide.....	5.00
Inert Ingredient(s):	<u>95.00</u>
	Total: 100.00

BACKGROUND: Product manager has requested review of efficacy data (MRID Number 447320-01 and 447320-02) to support the general disinfectant and food contact surface sanitizing label claims. Efficacy data were developed by employing electrolytically site-generated chlorine dioxide (ES-G). Chlorine dioxide solution was generated by means of an Oxychlor e Chlorine Dioxide Generator located at Sulphur Springs, Texas.

RECOMMENDATIONS:

The proposed amendment to add the new use pattern, **Electrolytic oxidation of Anthium Dioxide** by means of an electrolytic device, Oxychlor e Chlorine Dioxide Generator, to generate chlorine dioxide solution to use as a general disinfectant and food contact surface sanitizer is not acceptable because the Agency does not allow on the EPA accepted labels the oxidation processes through electrolytic means to generate the active species. On the EPA accepted labels Agency allows only chemical oxidation processes to generate chlorine dioxide solution. See 40 CFR 152.500. You may wish to sell your elctrolytic device, Oxychlor e Chlorine Dioxide Generator, without registration to generate chlorine dioxide solution to use as a general disinfectant and food contact surface sanitizer. However, it will be subject to FIFRA requirements listed in 40 CFR 152.500. Therefore, the submitted efficacy data (MRID Numbers 447320-01 and 447320-02) developed by employing electrolytically site-generated chlorine dioxide solution to support the general disinfectant and food contact surface sanitizing label claims were not reviewed or accepted.

LABELING:

The proposed labeling dated 03-18-99 and 05-12-99 with electrolytic oxidation claims are not acceptable.